

UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF MARYLAND

DANIEL BAIDEN,

Plaintiff,

v.

NAVIENT SOLUTIONS, LLC,

Defendant.

Case No.: 8:20-cv-01093-PX

**MOTION FOR SUMMARY JUDGMENT  
OF DEFENDANT, NAVIENT SOLUTIONS, LLC**

Defendant, Navient Solutions, LLC (“NSL”), hereby moves pursuant to Fed. R. Civ. P. 56 for the entry of summary judgment in its favor and against Plaintiff, Daniel Baiden (“Plaintiff”), and the dismissal of Plaintiff’s claims with prejudice.

In support of its motion, NSL incorporates by reference the supporting Memorandum of Law and Statement of Undisputed Facts with exhibits. Plaintiff does not consent to the relief requested by NSL.

A proposed form of Order is attached.

Respectfully submitted,

Dated: July 2, 2021

/s/ Thomas F. Lucchesi

Thomas F. Lucchesi, Esq.

Stradley Ronon Stevens and Young, LLP

2000 K Street, Suite 700

Washington, DC 20006

T: (202) 507-6401

F: (202) 822-0140

E: tlucchesi@stradley.com

*Attorney for Defendant, Navient Solutions, LLC*